

**From:** [Rafael Casanova](#)  
**To:** [Gloria-Small Moran](#)  
**Cc:** [Chuck Talton](#); [Gary Moore](#); [Gustavo Chavarria](#)  
**Subject:** Re: Falcon Refinery - Phone call from Steve Halasz, contractor  
**Date:** 09/25/2003 09:05 AM

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Gloria, for completeness sake, I am going to go review the field sampling scheme "again" for the PA, SI, and ESI for the Site, which were completed prior to proposing to the NPL. If my memory serves me, there were not over 100 samples taken from the wetland area, maybe over the entire site. Additionally, I believe the sediment samples that were taken were from the immediate surface of the sediment line. Many contaminants (such as those described at the Site) do sink and will not appear on the surface. I'll get back to you as soon as I can.

I already sense difficulty with this contractor. Maybe we should still impose the \$100,000 for my RI/FS oversight contractor to ensure compliance with CERCLA, or inform the PRP that we cannot approve this contractor (how many RI/FSs have they completed in the past?). Additionally, we could set up a peer review process with several reviewers charging to NORCO's account. Add that to the oversight costs. Thanks.

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**Assigned Sites:**

Brine Service Company Superfund Site (Corpus Christi, Texas) -  
<http://www.epa.gov/earth1r6/6sf/pdffiles/brine.pdf>  
Falcon Refinery Site (Ingleside, Texas) -  
<http://www.epa.gov/earth1r6/6sf/pdffiles/falcon.pdf>  
Many Diversified Interests, Inc. Superfund Site (Houston, Texas) -  
<http://www.epa.gov/earth1r6/6sf/pdffiles/mdi.pdf>  
Star Lake Canal Superfund Site (Port Neches, Texas) -  
<http://www.epa.gov/earth1r6/6sf/pdffiles/starlake.pdf>

▼ [Gloria-Small Moran](#)

**Gloria-  
Small  
Moran**

To: Rafael Casanova/R6/USEPA/US@EPA  
cc: Gary Moore/R6/USEPA/US@EPA, Chuck  
Talton/R6/USEPA/US@EPA  
Subject: Falcon Refinery - Phone call from Steve Halasz,  
contractor

09/24/2003  
06:11 PM



9567969

Hello Rafael,

I received a phone call from Steve Halasz, contractor for NORCO, concerning the same issue that he raised in the meeting last Thursday. He talked about the wetlands, and wondered, again, whether sampling could occur after the facility is torn down. Halasz again was concerned about the number of samples that would be required by EPA, and the cost associated with each sample (approximately \$100,000).

Halasz indicated the following:

1. There are more than 100 samples taken by TCEQ in the wetlands.
2. The data from the samples is not indicative that more sampling is needed (at this time).

I informed him that you had indicated:

1. The number of samples would be decided in discussions between EPA and the contractor during the scoping of the sampling.
2. That you would be "reasonable" in requesting samples, and that a grid on the entire wetland would not be required.

His request:

Halasz wondered whether you conferred with a group (peer group) about the timing and number of samples required.

My response:

You ultimately answered to Myron Knudson, but that you also conferred with your managers and others about the sampling protocol to ensure consistency across sites.

Action:

What, if any, peer review occurs involving specific sampling protocols? Do you confer with any peer group about the manner of sampling?

I told Halasz that either you or I would get back to him with a response. (He is not suggesting that he speak personally with a peer group about this site).

Thanks and let me know.

Gloria  
x3193